

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**ZACHARY  
LONG,** )  
**A.L. (a minor),** )  
**Plaintiffs.** )                      **Case No.: 2:25-cv-00290**  
                        )  
vs. )  
                        )  
**FANTAIL, INC.<sup>1</sup>,** )  
                        )

**Defendant.                      COMPLAINT**

Plaintiffs Zachary Long and A.L. (“Plaintiffs”), by and through undersigned counsel, hereby complain against Defendant Fantail, Inc. (“Defendant”), and state as follows:

**JURISDICTION AND VENUE**

1. This is an action for unlawful employment practices brought under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e et seq.
2. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1343.

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<sup>1</sup> Upon information and belief, Epicure and Jack’s Tavern is the name Fantail, Inc. was doing business as at all relevant times of plaintiffs’ employment.

3. Venue is proper in this district under 28 U.S.C. § 1391(b) because the unlawful practices alleged herein occurred within the Middle District of Alabama, and Defendant conducts business in this district.

## **PARTIES**

4. Plaintiff Zachary Long is an adult resident of Autauga County, Alabama. At all times relevant, he was employed by Defendant as a cook.
5. Plaintiff A.L. is the minor daughter of Zachary Long and resides in Autauga County, Alabama. At all relevant times, she was employed by Defendant as a dishwasher.
6. Defendant Fantail, Inc. is an Alabama corporation operating a restaurant named Epicure and Jack's Tavern in Millbrook, Alabama, and was Plaintiffs' employer within the meaning of Title VII.

## **ADMINISTRATIVE EXHAUSTION**

7. Plaintiffs each filed timely charges of discrimination with the Equal Employment Opportunity Commission (“EEOC”), Charge Nos. 420-2025-01455 and 420-2025-01457, alleging sex-based harassment and retaliation.
8. Plaintiffs have received right-to-sue letters from the EEOC, and this action is timely filed.

## **FACTUAL ALLEGATIONS**

9. A.L., a 17-year-old employee, was sexually harassed by an inmate worker on work release from the Alabama Department of Corrections named Jeremy Sales, who made lewd comments and physical advances, including telling her “you sure do look sexy in those leggings”, attempting to hug her, and asking her for “love”.
10. Other female employees had previously reported similar conduct by Sales, including unwanted touching and lewd gestures.
11. Despite repeated complaints, Defendant failed to take corrective action.
12. On or about December 7, 2024, A.L. reported the harassment to the owner and head chef at the direction of her father, Zachary.
13. On December 12, 2024, Zachary Long was terminated from his position as a cook.
14. The next day, December 13, 2024, A.L. was also terminated.
15. Defendant terminated both Plaintiffs in retaliation for reporting sexual harassment, in violation of Title VII.
16. Defendant’s actions created a hostile and unsafe work environment, particularly for female and minor employees.

## **CLAIMS FOR RELIEF**

### **COUNT I**

#### **(Sex Discrimination and Hostile Work Environment – A.L.)**

16. Plaintiff A.L. re-alleges paragraphs 1 through 15 as if fully set forth herein.
17. Defendant subjected A.L. to a hostile work environment based on her sex, in violation of Title VII.
18. Defendant failed to take prompt and effective remedial action after learning of the harassment.
19. As a direct and proximate result, A.L. suffered emotional distress, mental anguish, and other damages.

### **COUNT II**

#### **(Retaliation – A.L.)**

20. Plaintiff A'mya Long re-alleges paragraphs 1 through 15.
21. Defendant terminated A.L. in retaliation for engaging in protected activity—reporting sexual harassment.

22. Defendant's actions violated Title VII.

### **COUNT III**

#### **(Retaliation – Zachary Long)**

23. Plaintiff Zachary Long re-alleges paragraphs 1 through 15.

24. Defendant terminated Zachary because he encouraged his daughter to report unlawful harassment.

25. Defendant's actions constitute unlawful retaliation under Title VII.

### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs respectfully request that this Court:

- A. Enter judgment in their favor and against Defendant;
- B. Award compensatory damages for emotional distress and mental anguish;
- C. Award punitive damages;
- D. Award back pay and front pay where applicable;
- E. Award attorneys' fees and costs pursuant to 42 U.S.C. § 2000e-5(k);
- F. Grant such other and further relief as the Court deems just and proper.

### **JURY DEMAND**

Plaintiffs demand a trial by jury on all issues so triable.

Respectfully submitted,

/s/ Terrell E. McCants

Terrell E. McCants ASB-2299-L68M

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Civil Rights Law Group, LLC

420 North 20<sup>th</sup> Street,

Suite 2200

Birmingham, AL 35203

e-mail: tmccants@thecivilrightslawgroup.com

phone: 205-771-4999